NEW MEXICO
ENVIRONMENT DEPARTMENT

SUSANA MARTINEZ
Governor
JOHN A. SANCHEZ
Lieutenant Governor

Harold Runnels Building
1190 South St. Francis Drive (87505)
P.O. Box 5469, Santa Fe, NM 87502-5469
Phone (505) 827-0187 Fax (505) 827-0160
www.nmenv.state.nm.us

RYAN FLYNN
Cabinet Secretary
BUTCH TONGATE
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 6, 2015

Mr. JC Tucker, Owner
Salvage Plus Metal Recycling
4279 Highway 64
Kirtland, NM 87417

Re: Industrial Storm Water; SIC 5093; NPDES Compliance Evaluation Inspection; Salvage Plus Metal Recycling, NMR05HK35, June 30, 2015

Dear Mr. Tucker:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Introduction, treatment scheme, and problems noted during this inspection are discussed in the "Further Explanations" section of the inspection report.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Gladys Gooden-Jackson
US Environmental Protection Agency, Region VI
Enforcement Branch (6EN-WM)
1445 Ross Avenue
Dallas, Texas 75202-2733

Bruce Yurdin
New Mexico Environment Department
Surface Water Quality Bureau
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

If you have any questions about this inspection report, please contact Sarah Holcomb at 505-827-2798 or at sarah.holcomb@state.nm.us.

Sincerely,

/s/ Bruce Yurdin

Bruce J. Yurdin
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

cc: Rashida Bowlin, USEPA (6EN-AS) by e-mail
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
Gladys Gooden-Jackson, USEPA (6EN-WM) by e-mail
Raquel Douglas, USEPA (6EN-WC) by e- mail
Everett Spencer, USEPA (6EN-WM) by e-mail
NMED District 2, Bob Italiano by e-mail

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

1	Transaction Code	2	NPDES	11	12	yr/mo/day	17	18	Inspec. Type	19	Inspector	20	Fac Type
	N	5	NMR05HK35			150630			-		S		2

Remarks: METAL RECYCLING

Inspection Work Days	67–69	Facility Evaluation Rating	70	BI	71	QA	72	73–74	75–80
			3	N		N			Reserved

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time /Date	Permit Effective Date
SALVAGE PLUS METAL RECYCLING, SAN JUAN COUNTY, NM: From Farmington, drive West on Highway 64 to Kirtland. Facility is at 4279 Highway 64.	1015 hours / 6-30-2015	6-4-2015
	Exit Time/Date 1155 hours / 6-30-2015	Permit Expiration Date 6-4-2020

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data
Mr. JC Tucker, Owner, (505) 598-6134	SIC: 5093
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. JC Tucker, Owner (505) 598-6134 4279 Highway 64, Kirtland, NM 87417	Contacted Yes * No

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	N	Flow Measurement	M	Operations & Maintenance	N	CSO/SSO
U	Records/Reports	M	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
M	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
S	Effluent/Receiving Waters	N	Laboratory	M	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

1. **Inspector arrived on site at 1015 hours on June 30, 2015 and made introductions, presented credentials and explained the purpose of the inspection to Mr. JC Tucker, Owner.**
2. **Please see report for further information.**
3. **An exit interview was conducted with Mr. Tucker at the facility at approximately 1145 hours on June 30, 2015 at the facility to present preliminary findings.**

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Sarah Holcomb */s/ Sarah Holcomb*	NMED/SWQB 505-827-2798	7-6-2015
Signature of Management QA Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**
Bruce Yurdin */s/ Bruce Yurdin*	NMED SWQB 505-827-2795	7-6-2015

NPDES Industrial Storm Water Checklist (MSGP)

National Database Information		General	
Inspection Type	CEI	Inspector Name	Sarah Holcomb
NPDES ID Number	NMR05HK35	Telephone	505-827-2798
Inspection Date	6-30-2015	Entry Time	1015 hours
Inspector Type *(circle one)*	EPA [State] EPA Oversight	Exit Time	1155 hours
Facility Sector/ SIC/Activity Code	Sector N/M; SIC 5093	Signature	*/s/ Sarah Holcomb*

Facility Location Information				
Name/Location/ Mailing Address	Salvage Plus Metal Recycling, 4279 Highway 64, Kirtland, NM 87417			
GPS Coordinates	Latitude	N. 36.7381	Longitude	W. -108.3446
Receiving Water(s)	Kirtland MS4 thence to the San Juan River.			

Contact Information		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	JC Tucker, Owner	505-598-6134
Facility Contact	JC Tucker	505-598-6134
Authorized Official(s)	JC Tucker	505-598-6134

Basic Permit Information			Basic SWPPP Information		
Permit Coverage	[Y]	N	SWPPP Prepared & Available	[Y]	N
Permit Type	[General]	Individual	SWPPP Contents Satisfactory	Y	[N]
Operational Date	1992		SWPPP Implementation Satisfactory	Y	[N]
NOI/Application Date	10-25-2011		SWPPP Date	10-20-2011	
If applicable, is no exposure certification on file?	Y	N	*Intentionally left blank*		

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Review			
General			**Notes:**
Was the SWPPP completed prior to NOI submission?	[Y]	N	
Copy of the NOI and acknowledgment letter from EPA?	[Y]	N	
Copy of the permit language?	[Y]	N	
Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires?	[Y]	N	
Does the SWPPP contain a signed/certified statement indicating that the site is inactive and unstaffed, and that there are no industrial materials or activities exposed to precipitation, in accordance with the substantive requirements in 40 CFR 122.26(g)(4)(iii)? Applicable to: • Routine facility inspection (4.1.3) • Quarterly visual assessment (4.2.3) • Benchmark monitoring (6.2.1.3).	Y	N	N/A
Does the SWPPP include copies of relevant parts of other documents (e.g., SPCC) referenced in the SWPPP?	Y	N	N/A
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	Y	[N]	Claimed Criterion C but there was no documentation other than an endangered species list for the area.
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	[Y]	N	
Does the SWPPP include documentation to support eligibility under NEPA (New Source)?	Y	N	NA
Did all “operators” sign/certify the SWPPP?	[Y]	N	Mr. Tucker signed on 3-30-2012.
Is the storm water pollution prevention team identified (name or title)?	[Y]	N	
Are the storm water pollution prevention team’s responsibilities identified?	[Y]	N	

NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
SWPPP provides a description of the facility's industrial activities?	[Y]	N	
Is there a general location map (e.g., USGS quadrangle map) with enough detail to identify the location of the facility and all receiving waters for storm water discharges?	[Y]	N	
Is there a site specific site map?	[Y]	N	
Does the site map contain the size of the property in acres?	Y	[N]	
Does the site map contain the location and extent of significant structures and impervious surfaces?	[Y]	N	
Does the site map contain directions of storm water flow (indicated by arrows)?	[Y]	N	
Does the site map contain locations of all existing structural control measures?	[Y]	N	
Does the site map contain locations of all receiving waters in the immediate vicinity of the facility, indicating if any of the waters are impaired, and if so, whether the waters have TMDLs established for them?	Y	[N]	Although receiving waters are indicated, there is no description of applicable TMDLs.
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	Y	N	
Does the site map contain locations of all potential pollutants and significant materials identified under Part 5.1.3.2?	[Y]	N	
Does the site map contain locations where significant spills or leaks identified under Part 5.1.3.3 have occurred?	Y	[N]	
Does the site map contain locations of all storm water monitoring points?	Y	[N]	Outfall indicated on the map no longer exists. Current outfall is not indicated.
Does the site map contain locations of storm water inlets and outfalls, with a unique identification (e.g., 001, 002) for each outfall and if substantially identical?	Y	[N]	
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	Y	[N]	
Does the site map contain locations and descriptions of all non-storm water discharges?	Y	[N]	

NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
Does the site map contain locations of the following activities where these activities are exposed to precipitation? • Fueling stations • Vehicle and equipment maintenance and/or cleaning areas • Loading/unloading areas • Locations used for the treatment, storage or disposal of wastes • Liquid storage tanks • Processing and storage areas • Immediate access roads and rail lines used or travelled by carriers of raw materials, manufactured products, waste materials, or by-products used or created by the facility • Transfer areas for substances in bulk • Machinery	Y	N	Map does not indicate where these activities take place.
Does the site map contain locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants?	Y	N	
Does the SWPPP document areas at the facility where industrial materials or activities are exposed to storm water and from which allowable non-storm water discharges are released?	Y	N	Vehicle dismantling, crushing, storage, and loading/unloading are all exposed to the elements.
Does the SWPPP include a list of the industrial activities exposed to storm water (e.g., material storage; equipment fueling, maintenance, and cleaning; cutting steel beams)?	Y	N	
Does the SWPPP include a list of pollutants and/or pollutant constituents associated with each identified activity?	Y	N	

NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
Does the SWPPP include documentation of where spills and leaks occurred for three years prior to the preparation of the SWPPP?	Y	N	

Site Description			Notes:
Does the SWPPP include a non-storm water discharge evaluation in the SWPPP? Does it include: • Date • Description of evaluation criteria • List of the outfalls or onsite drainage points directly observed • Different types of non-storm water discharges and source locations • Actions taken such as a list of control measures for elimination.	Y	N	
Does salt storage occur at this facility?	Y	N	
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	Y	N	According to permittee representative, no discharge events have occurred.

Controls to Reduce Pollutants			Notes:
Does the SWPPP include documentation of the location and type of control measures at the facility to comply with the requirements in Part 2?	Y	N	
Does the SWPPP include documentation that selection and design of control measures were based on a consideration of the practices and procedures in Part 2.1.1?	Y	N	

Does the SWPPP include measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings?	Y	[N]	
Does the SWPPP include good housekeeping measures (e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)?	[Y]	N	

NPDES Industrial Storm Water Checklist (MSGP)

Controls to Reduce Pollutants			Notes:
Does the SWPPP include a schedule for pickup and disposal of wastes and routine inspections of tanks and drums?	[Y]	N	
Does the SWPPP include preventative maintenance procedures, including regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line?	[Y]	N	
Does the SWPPP include a schedule for preventative maintenance procedures?	Y	[N]	
Does the SWPPP include procedures for minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur?	[Y]	N	
Does the facility implement procedures for plainly labeling containers (e.g., “Used Oil,” “Spent Solvents,” “Fertilizers and Pesticides,” etc.) that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur?	[Y]	N	
Does the facility implement preventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling?	[Y]	N	
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	Y	[N]	Releases by the crusher may sit in place for some time until they are cleaned up.
Does the facility train employees who may cause, detect, or respond to a spill or leak in these procedures and have necessary spill response equipment available?	Y	[N]	Not documented.
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	Y	[N]	Not documented.

NPDES Industrial Storm Water Checklist (MSGP)

Controls to Reduce Pollutants			Notes:
Does the SWPPP document erosion and sediment controls?	Y	[N]	
Does the facility stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, and the resulting discharge of pollutants?	Y	[N]	No stabilization is currently occurring but there do not appear to be major erosional issues.
Does the facility place flow velocity dissipation devices at discharge locations and within outfall channels where necessary to reduce erosion and/or settle out pollutants?	Y	[N]	
If the facility stores salt at this facility, are the piles enclosed or covered? Does the facility implement appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile?	Y	N	NA
Employee Training – is there a schedule for regular (at least annually) employee training?	Y	[N]	
Does training cover both the specific control measures used to achieve the effluent limits in Part 2 and monitoring, inspection, planning, reporting, and documentation requirements in other parts of the permit?	Y	[N]	No training is documented in the SWPPP.
Does the facility ensure that waste, garbage, and floatable debris are not discharged to receiving waters by keeping exposed areas free of such materials or by intercepting them before they are discharged?	[Y]	N	
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	[Y]	N	
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	[Y]	N	

NPDES Industrial Storm Water Checklist (MSGP)

Inspections (Part 4)			
General			**Notes:**
Routine Facility Inspections			
Are routine facility inspections conducted at least quarterly while facility operating?	Y	N	Inspections are missing from 3Q 2012, 3Q 2013, 4Q 2013, 1Q 2014, 2Q 2014, 3Q 2014.
Are inspections documented, including: • Date and time • Name and signature of inspector • Weather information and a description of discharge occurring at the time of the inspection • Previously unidentified discharges from site • Control measures needing maintenance or repairs • Failed control measures that need replacement • Incidents of noncompliance observed • Additional control measures needed.	Y	N	
Exceptions, including (see 4.1.3): • Inactive and unstaffed sites	Y	N	NA
Quarterly Visual Assessment			.
Are quarterly visual assessments conducted?	Y	N	Permittee representative indicates that there is no discharge from the facility.
Does the assessment consist of a sample collected: • Within the first 30 minutes of discharge • On discharges that occur at least 72 hours (3 days) from the previous discharge • Collected in a clean, clear glass or plastic container.	Y	N	

Inspections			
Are assessments documented, including: • Sample location • Sample collection date/time & visual assessment date/time • Personnel collecting sample & performing assessment and their signature • Nature of the discharge (runoff or snowmelt) • Results of observations (including color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen and other obvious indicators) • Probable sources of contamination • If applicable, reason for not taking samples within 1st 30 minutes.	Y	N	
Exceptions, including (see 4.2.3): • Adverse weather conditions • Climates with irregular storm water runoff • Areas subject to snow • Substantially identical outfalls (per 5.1.5.2) • Inactive and unstaffed sites.	Y	N	
Comprehensive Site Inspections			.
Are comprehensive site inspections conducted annually (start 9/29/08)?	Y	N	Two annual inspections are documented for 11-20-2011 and 12-9-2014.
Conducted by qualified personnel including at least one member of the storm water pollution prevention team?	Y	N	
Cover all areas of the facility?	Y	N	
Include a review of monitoring data? Do inspectors consider the results of the past year's visual and analytical monitoring when planning and conducting inspections?	Y	N	No data is available for review – permittee representative indicates that no discharge events have occurred.

NPDES Industrial Storm Water Checklist (MSGP)

Inspections			
Include observations of the following: • Industrial materials, residue, or trash that may have or could come into contact with storm water • Leaks or spills from industrial equipment, drums, tanks, and other containers • Offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site • Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas • Control measures needing replacement, maintenance, or repair • All storm water control measures observed.	[Y]	N	
Are inspections documented, including: • Date of inspection • Names and titles of personnel making the inspection • Findings from examination of areas of facility from Part 4.3.1 • All observations relating to implementation of control measures • Any required revisions to the SWPPP resulting from inspection • Any incidents of noncompliance identified OR certification that facility is in compliance with the permit • A statement signed in accordance with Appendix B, Subsection 11	[Y]	N	

NPDES Industrial Storm Water Checklist (MSGP)

Monitoring (Part 6)			
General			**Notes:**
Does the SWPPP contain a procedure for conducting sector (and co-located) specific benchmark monitoring?	Y	N	
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	Y	N	NA
Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required)	Y	N	NA
Are samples analyzed in accordance with 40 CFR Part 136 methods?	Y	N	NA
Benchmark Monitoring			
Does the monitoring consist of a sample collected: • Within the first 30 minutes of discharge • On discharges that occur at least 72 hours (3 days) from the previous discharge • Document the date and duration (in hours) of the rainfall event, rainfall total (snow - date only) for that rainfall • Prior to commingling.	Y	N	No monitoring has been conducted.
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	Y	N	NA
Is the average of the first four quarterly samples < the parameter benchmark?	Y	N	NA

Monitoring			
Is the average of the first four quarterly samples > the parameter benchmark? • Make the necessary modifications • Continue quarterly monitoring • Determine and document that no further pollutant reductions are technologically available and economically practicable and achievable, continue monitoring once per year, notify EPA • Natural background pollutant level documentation	Y	N	NA
Exceptions, including (see 6.1 & 6.2): • Adverse weather conditions • Climates with irregular storm water runoff • Snowmelt • Substantially identical outfalls (per 5.1.5.2) • Inactive and unstaffed sites.	Y	N	NA
Effluent Limitations Monitoring			
Sampled once per year?	Y	N	NA
Follow-up requirements if discharge exceeds effluent limit (see 6.3)?	Y	N	NA
Other Required Monitoring			
• State or Tribal provisions • Discharges to impaired waters • Additional monitoring required by EPA.	Y	N	NA

Reporting (Part 7)			
General			**Notes:**
Is monitoring data reported to EPA within 30 days of receiving analytical results for the monitoring period?	Y	N	NA
Is the annual report submitted by 45 days after conducting the comprehensive site inspection?	Y	N	NA
If follow-up effluent limitations monitoring results exceed numeric limits, was a report submitted to EPA no later than 30 days after results were received?	Y	N	NA

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff	*(e.g., use grading, berming, or curbing to prevent runoff of contaminated flows and divert run-on away; locate materials, equipment, and activities so that leaks are contained in existing containment and diversion systems; clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants; use drip pans and absorbents under or around leaky vehicles and equipment or store indoors where feasible; use spill/overflow protection equipment; drain fluids from equipment and vehicles prior to on-site storage or disposal; perform all cleaning operations indoors, under cover, or in bermed areas that prevent runoff and run-on and also that capture any overspray; and ensure that all washwater drains to a proper collection system*) Liquids are drained from vehicles prior to crushing. Liquids are placed into a used oil container which is hauled off periodically for disposal. Batteries removed from vehicles are stored palletized under a covering, but run-on could enter. Batteries are typically stored onsite for a period of 2-3 months, according to permittee representatives.
Good Housekeeping	*(e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)* Materials were stored in groupings across the site. Drums and other containers were labeled properly.
Preventative maintenance	*(e.g., regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line)* Functioning equipment is checked for leaks and spills are cleaned up as needed, according to permittee representatives, however, this is not documented. When equipment maintenance is needed, it is done on a concrete pad. Drip pans are used during fluid changes.

SWPPP Implementation	
Spill Prevention and Response	*(e.g., minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur)* 2 spill kits are located on site and consist of absorbent materials and shovels.

Erosion and Sediment Controls	*(e.g., stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, flow velocity dissipation devices at discharge locations and within outfall channels)* Site used to experience run-on issues from the stormwater discharges from Highway 64. NMDOT bermed the area recently to prevent run-on issues at the site. No major erosional issues were noted on site on the day of this inspection.
Management of Runoff	*(e.g., divert, infiltrate, reuse, contain, or otherwise reduce storm water runoff, to minimize pollutants in discharges)* Any stormwater accumulation appears to pond onsite. There are two low areas within the facility where the water ponds, and there is a retention pond at the southeast corner of the facility. According to permittee representatives, the site has not discharged.
Salt Storage Piles	*(e.g., enclose or cover piles appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile)* No salt storage occurs here.

SWPPP Implementation	
Waste, Garbage and Floatable Debris	*(e.g., keep exposed areas free of such materials or by intercepting them before they are discharged)* The site is generally organized. Some metal shavings and small pieces were noted around the site and should be cleaned up when possible in order to prevent being carried offsite in stormwater runoff.
Evidence of non-storm water discharges	No non-stormwater discharges were noted on the day of this inspection.
Dust Generation and Vehicle Tracking of Industrial Materials	*(minimize generation of dust and off-site tracking of raw, final, or waste materials)* There did not appear to be trackout issues on the day of this inspection.

Notes on SWPPP Implementation and Sector Specific Requirements

List and describe structural controls *(The selection, design, installation, and implementation of these control measures must be in accordance with good engineering practices and manufacturer's specifications)*

The new 2015 MSGP specifically notes the following controls and must be updated in the new SWPPP prepared for this facility.

1. **Inbound Recyclable Material Control**
2. **Outdoor Storage**
3. **Indoor Storage and Material Processing**
4. **Vehicle and Equipment Maintenance**

Additionally, the site map must be updated to include:

- **Scrap and waste material storage**
- **Outdoor scrap and waste processing equipment**
- **Containment areas for turnings exposed to cutting fluids**

The facility also conducts automobile salvage operations as a subsector activity. Under Sector M requirements, the facility must incorporate the following controls into the new SWPPP:

1. **Spill and Leak Prevention Procedures**
2. **Employee Training**
3. **Management of Runoff**

Additionally, the site map must be updated to include:

- **Locations used for dismantling, storing and maintaining used motor vehicle parts**
- **Dismantling areas**
- **Parts storage areas (engine blocks, tires, hub caps, batteries, hoods, mufflers, etc.)**
- **Liquid storage tanks and drums for fuel and other fluids.**

Benchmark monitoring applies to this facility.

For Sector N – if the facility is only accepting source-separated recyclables, primarily from non-industrial and residential sources, there is no benchmark monitoring requirement.

For Sector M – for stormwater discharged from the site, Total Suspended Solids (TSS), Total Aluminum, Total Iron and Total Lead must be measured.